

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**Case No.: 13-24865  
Judge: GMH  
Chapter: Chapter 13**

**In Re: Ahamed Ali  
Benita Ali**

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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The Debtors, through Geraci Law, LLC, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of factual and legal basis for the objection. File your written request at:

1. Clerk, U.S. Bankruptcy Court  
517 East Wisconsin Avenue, Room 126  
Milwaukee, WI 53202-4581

and provide copies to

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Geraci Law, LLC  
Andrew Mark Golanowski  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Ahamed Ali  
Benita Ali  
3225 55<sup>th</sup> Ct. Unit 84  
Kenosha, WI 53144

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the request and may enter an order modifying the Plan.

## REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponents of this modification are the Debtors.
2. This is a request to modify a Chapter 13 Plan:
  - a. ☒ post-confirmation
  - b. ☐ pre-confirmation
    - i. Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
    - ii. Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:
3. The Proponent wishes to modify the Chapter 13 Plan to do the following: account for the application for compensation on file.
4. The reason(s) for the modification is/are: see above.
5. Select A or B:
  - A. ☒ The confirmed Chapter 13 Plan is modified as follows: Geraci Law, LLC shall receive an additional \$342.50 in attorney fees through the Plan. Allowed general unsecured claims shall receive a pro rata share of not less than \$1,269.50.
  - B. ☐ The unconfirmed Chapter 13 Plan is modified as follows:

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the even of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

**CERTIFICATION**

Complete one of the certifications below:

1. I/We, \_\_\_\_\_, the debtor(s) in this case, certify that I/we have reviewed the modification to the Chapter 13 plan proposed in this motion, and I/we authorize my/our attorney to file it with the court.

\_\_\_\_\_  
Debtor

\_\_\_\_\_  
Date

\_\_\_\_\_  
Debtor

\_\_\_\_\_  
Date

OR

2. I, Andrew Golanowski, attorney for the debtor(s), certify that I have reviewed the modification proposed above with the debtor(s), and that the debtor(s) has/have authorized me to file it with the court.

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Thursday, July 16, 2015.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney for Debtor  
Bar #: 1055499

Andrew Mark Golanowski  
Law Offices of Peter Francis Geraci  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Fax: (312) 332-6354  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**Case No.: 13-24865  
Judge: GMH  
Chapter: Chapter 13**

**In Re: Ahamed Ali  
Benita Ali**

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**CERTIFICATE OF SERVICE**

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The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Thursday, July 16, 2015:

Ahamed Ali  
Benita Ali  
3225 55<sup>th</sup> Ct. Unit 84  
Kenosha, WI 53144

**SEE ATTACHED LIST**

Additionally, the documents referenced above were also served via electronic means on the following individuals on Thursday, July 16, 2015:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Thursday, July 16, 2015.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney of the Debtor  
Bar #: 1055499

Andrew Mark Golanowski  
Law Offices of Peter Francis Geraci  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Fax: (312) 332-6354  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

Label Matrix for local noticing  
0757-2  
Case 13-24865-gmh  
Eastern District of Wisconsin  
Milwaukee  
Thu Jul 16 12:54:40 CDT 2015  
  
ADT Security Services  
C/O Equinox Financial MGMT  
Po Box 455  
Park Ridge, IL 60068-0455

AmeriCredit Financial Services, Inc. dba GM  
P O Box 183853  
Arlington, TX 76096-3853

PRA Receivables Management, LLC  
POB 41067  
NORFOLK, VA 23541-1067

(p)AMERICREDIT  
PO BOX 183853  
ARLINGTON TX 76096-3853

(p)AMERICOLLECT INC  
PO BOX 2080  
MANITOWOC WI 54221-2080

Aurora Medical Center  
Bankruptcy  
PO Box 341457  
Milwaukee, WI 53234-1457

Bruck Law Offices, SC  
2011SC007694  
322 E. Michigan St., 6th fl.  
Milwaukee, WI 53202-5012

CAPITAL ONE BANK (USA), N.A.  
PO Box 12907  
Norfolk VA 23541-0907

CP-SRMOF II 2012-A TRUST  
c/o Selene Finance  
9990 Richmond Avenue, Suite 400  
Houston, TX 77042-4546

Capital One  
Attn: Bankruptcy Dept.  
Po Box 5253  
Carol Stream, IL 60197-5253

(p)CAPITAL ONE  
PO BOX 30285  
SALT LAKE CITY UT 84130-0285

Capital One, N.A.  
c o Becket and Lee LLP  
POB 3001  
Malvern, PA 19355-0701

Cavalry Portfolio Services  
500 Summit Lake Drive, Ste 400  
Valhalla, NY 10595-2322

Children's Hospital of Wisconsin  
Attn: Bankruptcy Dept.  
9000 W. Wisconsin Ave.  
Milwaukee, WI 53226-4874

Dental Associates  
11711 W Burleigh ST  
Wauwatosa, WI 53222-3196

Department of Workforce Dev.  
Unemployment Insurance  
PO Box 7888  
Madison, WI 53707-7888

Equifax  
Attn: Bankruptcy Dept.  
PO Box 740241  
Atlanta, GA 30374-0241

Experian  
Attn: Bankruptcy Dept.  
PO Box 2002  
Allen, TX 75013-2002

GM Financial  
Attn: Bankruptcy Dept.  
Po Box 181145  
Arlington, TX 76096-1145

Gray & Associates  
2012CV001233  
16345 West Glendale Dr.  
New Berlin, WI 53151-2841

Hemmer Law Office  
2003SC000441  
633 W. Wisconsin Avenue, #1305  
Milwaukee, WI 53203-1907

Heuer Law Offices  
Bankruptcy Dept  
9312 W National Ave  
West Allis, WI 53227-1542

IRS Priority Debt  
Attn: Bankruptcy Dept.  
PO Box 7346  
Philadelphia, PA 19101-7346

Kenosha County Circuit Court  
2012CV001233  
912 56th Street  
Kenosha, WI 53140-3736

Kenosha County Circuit Court  
2012UC000118  
912 56th Street  
Kenosha, WI 53140-3736

Kenosha County Circuit Court  
2013SC0752  
912 56th Street  
Kenosha, WI 53140-3736

Kohls/Capone  
Attn: Bankruptcy Dept.  
N56 W 17000 Ridgewood Dr  
Menomonee Falls, WI 53051-7096

MHFS  
Attn: Bankruptcy Dept.  
10200 W Innovation Dr St  
Milwaukee, WI 53226-4826

Milwaukee County Circuit Court  
2011SC007694  
901 N. 9th ST.  
Milwaukee, WI 53233-1425

Office of the U. S. Trustee  
517 East Wisconsin Ave.  
Room 430  
Milwaukee, WI 53202-4510

Oliver Adjustment Co.  
Bankruptcy Dept.  
3416 Roosevelt Rd  
Kenosha, WI 53142-3937

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

Selene Finance/Flagstar  
Attn: Bankruptcy Dept.  
PO Box 421639  
Houston, TX 77242-1639

State Collection Service  
Attn: Bankruptcy Dept.  
2509 S Stoughton Rd  
Madison, WI 53716-3314

State of Wisconsin  
DWD - Unemployment Insurance  
P.O. Box 7888  
Madison, WI 53707-7888

Stone Creek Condo Association  
Attn: Bankruptcy Dept.  
3119 55th Court  
Kenosha, WI 53144-4632

TD BANK USA, N.A.  
C O WEINSTEIN AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121-3132

Target  
Attn: Bankruptcy Dept.  
Po Box 673  
Minneapolis, MN 55440-0673

Transunion  
Attn: Bankruptcy Dept.  
PO Box 1000  
Chester, PA 19016-1000

United Hospital System, Inc  
Olive Adjustment Co  
of Kenosha & Racine  
3416 Roosevelt Road  
Kenosha, WI 53142-3937

Wisconsin Department of Revenue  
Attn: Special Procedures, MS 4-SPU  
PO BOX 8901  
Madison WI 53708-8901